

### **REMARKS**

Claims 1-7, 9, 17, 20, 29, and 30 are pending and at issue in the above identified patent application. Claims 8, 16, and 19 are currently withdrawn from consideration. Of the claims at issue, claims 1 and 30 are independent. In view of the foregoing amendments and the following remarks, reconsideration of the application is respectfully requested.

### **Specification**

The specification has been amended to correct the continuation data. The foregoing modification should eliminate any objection to the specification.

### **The Rejections under 35 U.S.C. § 103**

Claims 1-7, 9, 17, 20, 29, and 30 were rejected as being unpatentable over Clark (US 2,878,532) in view of Leuchten (US 4,803,108). However, neither Clark nor Leuchten, either alone or in combination, discloses or suggests a flexible fabric covering that substantially encases or encloses a resilient core. Accordingly, it is respectfully submitted that all claims are allowable over these patents for the reasons set forth below.

As amended, independent claims 1 and 30 both specify, *inter alia*, a door comprising a resilient core, a flexible fabric covering that substantially encases or encloses the resilient core, and an actuation system wherein a panel of the door is able to recover a relaxed shape after an impact causes the panel to deform out of co-planar alignment. The applicants respectfully submit that neither Clark nor Leuchten et al. disclose such elements, and furthermore, there is no teaching or suggestion in either reference that a flexible fabric covering could be utilized as claimed.

In contrast, Clark is directed to a solid, steel door assembly having first and second inflexible panels which are laterally moveable relative to the door. Specifically, Clark discloses a solid, steel door assembly which is stiff and rigid. As noted by the examiner, Clark fails to disclose panels formed of a resilient core having a covering, let alone a flexible,

fabric covering as recited claims. Thus, Clark fails to satisfy the resilient and flexible elements of the pending claims. For this deficiency, the examiner has looked to the teachings of the Leuchten reference.

Leuchten, however, similarly fails to disclose a resilient core having a flexible fabric covering that substantially encases or encloses the resilient core. To the converse, Leuchten is directed to the production of an automotive door panel reinforcement sheet having a honeycomb surrounded by adhesive and adapted to be directly mounted and adhered a rigid automotive door panel. While Leuchten discloses a reinforcement backing (15) the reinforcement backing does not substantially encase the honeycomb, but rather merely provides support to the back side of the honeycomb sheet. Furthermore, one side of the Leuchten panel must remain exposed so that the adhesive layer can adhere to the rigid automobile door.

Furthermore, there is no teaching or suggesting in Leuchten to modify the structure of the reinforced door panel of Leuchten to include a flexible fabric cover that substantially encases or encloses the resilient core. In particular, as noted above, one side of the Leuchten panel must remain exposed to allow the honeycomb to properly adhere to the rigid panel. Moreover, in the objects of the invention section of the Leuchten reference, wherein it attempts to set forth the advantages garnered by its teachings, Leuchten states that it is an object of its member.” Here, applicants submit invention “to provide such a reinforcing sheet containing a honeycomb member for the reinforcement of a panel, which sheet is sufficiently flexible to conform to the shape of the panel to be reinforced.” The objects of the invention further state that it is an object of its invention to “provide a reinforced panel which exhibits improved resistance to impact, buckling and bending compared to an unreinforced panel or a panel reinforced by a conventional reinforcing sheet without a honeycomb that Leuchten could not be more clear in its contention that buckling and bending of its panel upon impact

is a negative or detrimental aspect to be avoided and that such buckling and bending can only be avoided by adhering the honeycomb to the original door panel. Therefore, a flexible fabric cover that substantially encases the resilient core is in direct contrast to the teachings of Leuchten.

Thus, due to the deficiencies in both Clark and Leuchten, it follows that no combination of Clark and Leuchten can render obvious claims 1, 30, or any claims dependent thereon. In particular, because neither Clark nor Leuchten discloses a flexible fabric cover that substantially encases or encloses a resilient core, no combination of Clark and Leuchten can obviate the pending claims. Accordingly, it is respectfully submitted that claims 1, 30, and all claims dependent thereon are in condition for allowance.

#### **Conclusion**

Reconsideration of the application and allowance thereof are respectfully requested. If there is any matter that the examiner would like to discuss, the examiner is invited to contact the undersigned representative at the telephone number set forth below.

The Commissioner is hereby authorized to charge any deficiency in the amount enclosed or any additional fees which may be required during the pendency of this application to Deposit Account No. 50-2455.

Respectfully submitted,  
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